

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GLOBAL TRANSPORTE OCEANICO,

Plaintiff,

-against-

BRYGGEN SHIPPING and TRADING A/S,

Defendant.

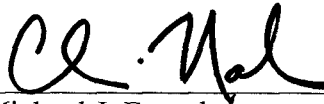
08 Civ. 6387 (DLC)

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT upon the Affirmation of Christopher R. Nolan dated July 31, 2008, the declaration of Vadali Murthy dated July 31, 2008, and the accompanying Memorandum of Law in Support, and all pleadings heretofore had in this matter, Defendant Bryggen Shipping and Trading A/S will move this Court, before the Honorable Denise L. Cote, United States District Judge, at 500 Pearl Street, Courtroom 11B, New York, New York, on a date to be set by this Honorable Court, for an order pursuant to Rule E(7)(a) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, directing (a) Plaintiff Global Transporte Oceanico to give counter-security to the Defendant for the damages demanded in the Defendant's counter-claim within 10 days from the issuance of the order; and (b) directing such other and further relief as the Court may deem proper.

Dated: New York, New York
July 31, 2008

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